

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

3:24-cr-00307-SI

v.

INFORMATION

DANIEL ALLEN STOWELL,

18 U.S.C. § 2252A(a)(2) and (b)(1)

18 U.S.C. § 2252A(a)(5)(b) and (b)(2)

Defendant.

Forfeiture Allegation

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1

(Distributing Child Pornography)

(18 U.S.C. § 2252A(a)(2) and (b)(1))

On or about December 13, 2022, in the District of Oregon, defendant **DANIEL ALLEN STOWELL** knowingly and unlawfully distributed child pornography, defined in Title 18, United States Code, Section 2256(8), using any means or facility of interstate or foreign commerce or that has been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(2) and (b)(1).

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COUNT 2
(Receiving Child Pornography)
(18 U.S.C. § 2252A(a)(2) and (b)(1))

On or about November 19, 2023, in the District of Oregon, defendant **DANIEL ALLEN STOWELL** knowingly and unlawfully received child pornography, defined in Title 18, United States Code, Section 2256(8), using any means or facility of interstate or foreign commerce, or that has been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(2) and (b)(1).

COUNT 3
(Possession of Child Pornography)
(18 U.S.C. § 2252A(a)(5)(B) and (b)(2))

On or about November 21, 2023, in the District of Oregon, defendant **DANIEL ALLEN STOWELL** knowingly and unlawfully possessed material containing child pornography that is distinct from the child pornography described in Count 2 and that had been shipped or transported using any means or facility of interstate or foreign commerce, or in or affecting interstate or foreign commerce by any means, including by computer, or that was produced using materials that had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, said material including depictions of a prepubescent minor or a minor who had not attained 12 years of age.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

Criminal Forfeiture Allegation

Pursuant to Title 18, United States Code, Section 2253, upon conviction of an offense described above in Counts 1 through 3 of this information, defendant **DANIEL ALLEN STOWELL** shall forfeit to the United States any and all matter that contains visual depictions of minors engaging in sexually explicit conduct that were produced, transported, mailed, shipped, received, or possessed in violation thereof, and any and all property that was used or was intended to be used in any manner or part to commit or promote the commission of the aforementioned violations, including without limitation the following:

- Black gaming personal computer
- Black external hard drive (SSD) (SN:NABFQHWL)
- Black iPhone 12, IMEI # 356599145630878
- Black Amazon Fire HD10 (model #M2V3R5)

Dated: August 14, 2024.

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

/s/ Charlotte Kelley
CHARLOTTE KELLEY, DCB #1736456
Assistant United States Attorney